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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

OFELIA M. RONQUILLO,

DEFENDANT.

) 2:17-CR-107-APG-CWH

) [PROPOSED] ORDER AUTHORIZING
) DISCLOSURE OF GRAND JURY
) INFORMATION AND TAX RETURN
) INFORMATION; AND PROTECTIVE
) ORDER

Having considered the Government's Unopposed Motion For (1) Order
Authorizing Disclosure Of Grand Jury Information and Tax Return Information; and (2)
Protective Order, and the record and file in this case, for good cause shown,

IT IS HEREBY ORDERED that plaintiff United States of America is authorized
to disclose to defendant and her counsel, copies of the grand jury testimony of witnesses
who the government may call at trial and other documents which may be considered
matters occurring before the grand jury (collectively, "Grand Jury Information"). This

1 Order is being entered to facilitate the government's compliance with its discovery
2 obligations, including the disclosure provisions of the Jencks Act, 18 U.S.C. § 3500; Rule
3 16 of the Federal Rules of Criminal Procedure; Brady v. Maryland, 373 U.S. 83 (1963),
4 and United States v. Giglio, 405 U.S. 150 (1972).

5 IT IS FURTHER ORDERED that the United States of America is authorized to
6 disclose to the individuals whom the government determines that it may be calling as
7 witnesses in its case-in-chief, and their counsel, the grand jury testimony of that
8 individual. This order is being entered based on this Court's finding that such
9 disclosure is reasonably necessary, in the interests of justice and does not significantly
10 compromise the imperative of grand jury secrecy.

11 IT IS FURTHER ORDERED that the any copies of the grand jury testimony
12 provided pursuant to this Order, and any reproductions or copies made of the produced
13 copy, shall be returned to the government as so requested by the government at the
14 conclusion of the proceedings in this case.

15 IT IS FURTHER ORDERED, pursuant to 26 U.S.C. § 6103(h)(4), and based on
16 the unopposed motion of the government, that the government is authorized to disclose
17 to the defendant and her counsel tax returns, tax return information, and taxpayer
18 return information as defined in 26 U.S.C. § 6103(b) (collectively, "Tax Information")
19 pertaining to this prosecution or otherwise appropriately disclosed by the government
20 pursuant to its discovery obligations.

21
22 PROTECTIVE ORDER

23 The government represents to this Court that it intends to produce documents
24 that include the Grand Jury Information and Tax Information described above, and
25 discovery documents containing personal identifying information such as social security
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1 numbers, driver's license numbers, dates of birth, bank account numbers, and addresses
2 of potential witnesses in this case (collectively, "Protected Material").

3 The government also represents to the Court that counsel for the defendant does
4 not object to the entry of a protective order.

5 Accordingly,

6 **IT IS FURTHER ORDERED THAT**

7 1. The Protected Material produced by the government may be used by the
8 defendant, the defendant's counsel, and any employees or agents of defendant's counsel
9 solely in the defense of this case.

10 2. The defendant's counsel and the defendant shall not disclose the
11 Protected Material directly or indirectly, except (a) for purposes of proceedings before
12 this Court, including hearings, court filings, and trial (and then in accordance with
13 Nevada Local Rule IC 6-1 (Redaction)); and (b) to any person assisting the defense,
14 persons who are interviewed as witnesses, and potential experts (collectively,
15 "Authorized Persons") in the defense of this case.

16 3. The Protected Material produced by the government shall not be copied
17 or reproduced unless it is copied or reproduced for Authorized Persons to assist in the
18 defense of this case, and in that event, the copies shall be treated in the same manner
19 as the original material.

20 4. When providing the Protected Material to an Authorized Person, the
21 defendant's counsel must inform the Authorized Person that the Protected Material is
22 provided subject to the terms of this Protective Order and that the Authorized Person
23 must comply with and is independently bound by the terms of this Protective Order.

1 IT IS FURTHER ORDERED THAT upon the final disposition of this case,
2 including after disposition of any appeal or collateral review, the defendant, the
3 defendant's counsel, and any Authorized Persons shall return to the government all
4 Protected Material to the government as so requested by the government.

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6 IT IS SO ORDERED.

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8 DATED: May 5 , 2017

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12 CARL W. HOFFMAN
13 United States Magistrate Judge
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